



University of Hawaii at Manoa

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October 5, 1987
RP:0078

Mr. James K. Ikeda, Acting Chief
Environmental Protection and
Health Services Division
Department of Health
P.O. Box 3378
Honolulu, Hawaii 96801

Dear Mr. Ikeda:

Water Quality Certification
Kaanapali North Beach Coastal Infrastructure
Kaanapali, Maui

The Environmental Center has recently conducted a review of the Draft Environmental Impact Statement (EIS) for the above referenced project with the assistance of Hans-Jurgen Krock, Ocean Engineering; and Jennifer Crummer, Environmental Center. In the course of this review, the following comments pertinent to water quality issues were cited:

Coastal water quality, as a result of the proposed infrastructure, would not necessarily be improved, as suggested in both the Environmental Assessment (EA) and the Draft EIS. The shift from agriculture to an urbanized use most likely would result in two major changes. First, infiltration, once accommodated by greater soil surface, can be expected to decline as a result of paving and construction on previously open surfaces. This reduction in infiltration has not been addressed adequately. Secondly, changes in water quality simply may involve different constituents in an urbanized state. Though agricultural uses of land can contribute chemical pollutants from pesticides and fertilizers to run-off, urban usage of land can also provide such pollutants. Oil, lead, and various other chemical pollutants are common constituents of runoff from an urbanized resort area. An increase in the quantity of run-off probably will result in additional impacts to coastal environments.

We thank you for the opportunity to share our comments.

Yours truly,

Jacquelin N. Miller
Associate Environmental Coordinator

cc: OEQC

L. Stephen Lau
Hans-Jurgen Krock
Jennifer Crummer

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